

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

JARED PAUL COLLIER,

Defendant.

Case No. 1:24-mj-442

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Robert Henschel, being duly sworn, depose and state the following:

INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging JARED PAUL COLLIER with unlawfully, knowingly, and intentionally combining, conspiring, confederating, and agreeing with others, known and unknown, to unlawfully, knowingly, and intentionally distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

2. I have been employed as a Special Agent with the Drug Enforcement Administration since 2018. I am presently assigned to DEA's Washington Division Office, High Intensity Drug Trafficking Area Task Force Group 11. Task Force Group 11 focuses primarily on the shipment of controlled substances by mass transit and in parcels.

3. As a DEA Special Agent, I investigate criminal violations of federal narcotics laws, including but not limited to violations of 21 U.S.C. §§ 841 and 846, and related offenses. I

have received training in this regard at the DEA Training Academy in Quantico, Virginia. I have participated in the execution of numerous state and federal search warrants for the seizure of illegal narcotics, paraphernalia related to the use of illegal narcotics, money or proceeds derived from the sale of narcotics, and records and documents pertaining to the purchase and sale of controlled substances. I also have been involved in the debriefing of defendants, witnesses, informants, and others who have knowledge of the distribution and transportation of controlled substances and of the laundering and concealment of proceeds from drug trafficking.

4. As a result of my training and experience, I am familiar with the manner in which controlled substances are used and distributed. I have also become familiar with the methodology used in narcotics trafficking operations, as well as the unique trafficking patterns and language employed by drug dealers. As a Special Agent, I have interviewed many individuals involved in drug trafficking and have obtained information from them regarding the acquisition, sale, importation, manufacture, and distribution of controlled substances. Based on my training and experience, I am familiar with the actions, habits, traits, methods, and terminology used by the traffickers of controlled dangerous substances.

5. This affidavit is based upon my own knowledge of the investigation of Jared Paul COLLIER, information provided to me by law enforcement officials from various other agencies, my review of documents and information, to include official government information, physical surveillance, and other information gathered during this investigation. Because this affidavit is being submitted for the limited purpose of enabling this Court to make a judicial determination of probable cause to issue a complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I

believe are necessary to establish the legal basis for the issuance of a complaint and arrest warrant.

FACTS SUPPORTING PROBABLE CAUSE

September 17, 2024 Arrest of Jared COLLIER

6. On or around September 17, 2024, DEA Group 11, assisted by the Virginia State Police (“VSP”), arrested COLLIER for outstanding criminal arrest warrants in Prince William County and Arlington County, Virginia. COLLIER was wanted in Prince William County on a charge of failure to appear to his sentencing hearing for a previous drug and firearm conviction. During his arrest, a Glock 27 semiautomatic handgun was found in COLLIER’s pocket. Prior to COLLIER’s transport to the Prince William County Adult Detention Center, a relative took possession of his personal items, to include multiple cell phones and a black backpack.

Search and Seizure of TARGET PARCEL

7. On or around September 20, 2024, DEA Group 11 was notified that the United States Postal Inspection Service (“USPIS”) had identified a suspicious parcel with USPS tracking number 9505 5118 0436 4257 9293 57 (hereinafter referred to as “TARGET PARCEL”) addressed to an address on Metropolitan Center Drive in Springfield, Virginia. The TARGET PARCEL contained a shipper address in Tempe, Arizona. The TARGET PARCEL was seized by USPIS prior to delivery. The TARGET PARCEL was marked as USPS Priority Mail, with a weight of 11 lb 10.4 oz, an expected delivery date of 9/16/2024, and postage reflecting a shipping cost of \$60.65.

8. A certified narcotics detection K-9, “Storm,” was deployed on the TARGET PARCEL by DEA Task Force Officer (TFO) Patrick Briant. K-9 “Storm” alerted to the odor of

narcotics on the TARGET PARCEL and USPIS obtained a federal search warrant through the Eastern District of Virginia to search the TARGET PARCEL.¹

9. Upon executing the search warrant on the TARGET PARCEL, investigators found a black toolbox which contained six (6) cylindrical bundles wrapped in saran wrap and black wrapping, with numbers on the outside. The six (6) bundles found in the TARGET PARCEL had an overall weight of approximately 3.5538 kilograms and were marked with the numbers: 11, 14, 15, 16, 17, and 18. Investigators with Group 11 seized the items as evidence and submitted them to the DEA laboratory for testing. These bundles are pictured below in Figure 1:



Figure 1-Marked bundles found in TARGET PARCEL

10. Investigators removed the black wrapping on the bundles found in the TARGET PARCEL, which revealed round blue pills marked “M-30,” which appeared to be counterfeit pressed pills containing fentanyl (hereinafter, “fentanyl pills”).² The pills are pictured below in Figure 2:

¹ The USPIS search warrant (1:24-sw-671) was issued on September 20, 2024 by United States Magistrate Judge William B. Porter in the Eastern District of Virginia.

² Law enforcement officers commonly find narcotics dealers selling round blue pills imprinted with “M” and “30” which mimic the markings associated with oxycodone 30mg pills manufactured by Mallinckrodt Pharmaceutical. The widespread distribution of the counterfeit pills is marked by popular culture terminology such as “blues,” “M-30s,” “Perc’s,” and “Perc-



Figure 2-TARGET PARCEL bundle contents

Search of COLLIER's Residence

11. On September 27, 2024, Group 11 and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) executed a Virginia state search warrant on COLLIER’s residence, which was located on Metropolitan Center Drive in Springfield, Virginia in Fairfax County, Virginia, within the Eastern District of Virginia. It should be noted that COLLIER’s residence is the same as that listed as the recipient address on the TARGET PARCEL with the exception of the apartment number—the apartment number listed on the TARGET PARCEL is the apartment next door to COLLIER’s residence. Upon searching the residence, investigators found a Palmetto State Armory PA-15 Assault Rifle, various ammunition, drug scales, receipts, credit cards in the name of Jared COLLIER, the black backpack found on COLLIER during his arrest,

30's." "Perc" is a commonly used slang reference that is short for "Percocet" which is a name brand prescription pain killer that contains oxycodone. It is common in the Eastern District of Virginia, and throughout the United States, for counterfeit pressed pills containing fentanyl to be manufactured to look like legitimate oxycodone pills.

assorted records and documents containing COLLIER's name, and multiple cellular phones, to include an iPhone 14 Pro Max (hereinafter referred to as "TARGET DEVICE").

12. COLLIER was not present at the residence during the search, as he was still held at the Prince William Adult Detention Center for his arrest on an outstanding warrant; however, a relative was present during the search. The relative inside the residence told investigators during the search that the TARGET DEVICE belonged to COLLIER. The TARGET DEVICE was also the same device investigators found on COLLIER's person during his arrest on September 17, 2024. During that arrest, investigators allowed the device to be taken by the same relative present during the search of the residence.

13. During the search, investigators also found a USPS receipt which contained shipping information for a package sent from a USPS store in Tempe, Arizona on 8/23/2024. Investigators noted that the receipt contained the same city and zip code present on the shipping information for the TARGET PARCEL.

Search of the TARGET DEVICE

14. Following the search of COLLIER's residence, investigators were able to gain access to the TARGET DEVICE pursuant to the state search warrant. Upon review of the TARGET DEVICE, investigators found it contained the name "Jared's iPhone." Upon review of the contents of the TARGET DEVICE, investigators found evidence that COLLIER conspired to distribute narcotics, to include fentanyl, as well as evidence that the TARGET PARCEL was shipped by COLLIER from Arizona and that he was the intended recipient.

15. Specifically, the TARGET DEVICE took a photograph³ of the TARGET PARCEL on September 13, 2024—the date the TARGET PARCEL was shipped from Arizona. The photograph matches the description of the TARGET PARCEL and also includes the same shipper information. A partial view of the recipient, albeit partially obscured, was also consistent with the TARGET PARCEL. Based on my training and experience, as well as my knowledge of this investigation, I believe that the photograph taken on September 13, 2024 is a picture of the TARGET PARCEL.

16. Investigators also found that the TARGET DEVICE took a photograph on September 12, 2024 of the black bundles found in the TARGET PARCEL, which included the bundle marked “15.” This picture is seen below in Figure 3:



Figure 3- Photo taken by the TARGET DEVICE of the narcotics bundle marked “15”

³ Investigators believe that this photograph (and others referred to below) were taken by the TARGET DEVICE based on data attached to the photograph. When reviewing this photograph on the TARGET DEVICE, the data attached to the photograph states that the photograph was taken by “iPhone 14 pro max main camera.” Based on my training and experience, and my review of these photographs, I believe that means that the main camera of the TARGET DEVICE took this photograph.

17. Moreover, on September 13, 2024, the TARGET DEVICE took a photograph of the TARGET PARCEL's USPS receipt, which contained information consistent with that found on the exterior of the TARGET PARCEL. Specifically, the receipt listed the same tracking number, a destination of Springfield, Virginia on September 16, 2024, a weight of 11lb 10.4 oz, and a shipping cost of \$60.65. The picture of the receipt is depicted below in Figure 4:



Figure 4-TARGET PARCEL USPS receipt taken by the TARGET DEVICE

18. The TARGET DEVICE was also found to contain multiple pay/owe sheets. These pay/owe sheets include the names of multiple unindicted co-conspirators who either provided COLLIER money for narcotics, or to whom COLLIER owed money for narcotics. Based on my training and experience, these pay/owe sheets are indicative of how members of a conspiracy keep track of money and narcotics that are owed to each member of the conspiracy.

The TARGET DEVICE also had notes and messages regarding narcotic prices based on the amount of “pills” COLLIER would purchase.

19. The TARGET DEVICE also contained conversations with individuals in which COLLIER discussed payments, shipment dates, and purchases of narcotics. Specifically, the TARGET DEVICE includes conversations with individuals from whom COLLIER is purchasing narcotics—specifically, fentanyl pills. For example, on numerous occasions between April and August of 2024, COLLIER discussed the purchase of large amounts of fentanyl pills from unindicated co-conspirator 1 (“UCC-1”). Amounts discussed in these conversations range from 20,000 to 200,000 pills. Based on my training and experience, I know that 20,000 fentanyl pills total a net weight of approximately 2,000 grams. Throughout the conversation, COLLIER and UCC-1 referred to “blues,” which I know to be slang for counterfeit pressed pills containing fentanyl. Additionally, both COLLIER and UCC-1 referenced “kpacks,” a term which refers to a pack of 1,000 fentanyl pills.

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CONCLUSION

20. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that starting from at least April 2024 through the present, within the Eastern District of Virginia and elsewhere, JARED PAUL COLLIER, unlawfully, knowingly, and intentionally combined, conspired, confederated, and agreed with others, known and unknown, to unlawfully, knowingly, and intentionally distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

Respectfully submitted,

ROBERT
HENSCHEL

Digital signature of ROBERT HENSCHEL
Date: 2024.11.06 13:06:26 -05'00'

Robert Henschel
Special Agent
Drug Enforcement Administration

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1
by telephone on the 6th day of November, 2024.



Digital signature of Ivan Davis
Date: 2024.11.06 13:31:10 -05'00'

The Honorable Ivan D. Davis
United States Magistrate Judge